

**REMARKS**

Claims 1-8 and 10-21 are in the case and presented for consideration.

The Examiner rejected claims 1, 3-4, 5, 7-8, 10-11, and 14-21 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 6,226,670 to Ueno, et al. in view of Kelly, et al. (U.S. Published Patent Application No. 2005/0154531). The Examiner's reasons for the rejection are set forth on pages 2-3 of the February 15, 2006 Office Action.

In response, Applicant respectfully traverses the Examiner's above ground of rejection. To establish a *prima facie* case of obviousness, the initial burden is on the Examiner to show that there is suggestion or motivation in the reference for modifying or combining the teachings of the reference. See, e.g., MPEP § 2142. It is inappropriate to use applicant's disclosure as a blueprint (or to use hindsight based on knowledge obtained from application's patent disclosure) to reconstruct the claimed invention from selected pieces of prior art absent some suggestion, teaching, or motivation in the prior art to do so. See, e.g., *Uniroyal, Inc. v. Rudkin-Wiley Corp.*, 837 F.2d 1044, 1051-52, 5 USPQ2d 1434, 1438 (Fed. Cir. 1988); *In re Warner*, 379 F.2d 1011, 1017, 154 USPQ 173, 177 (CCPA 1967), cert. denied, 389 U.S. 1057(1968); *In re Rouffet*, 149 F.3d 1350, 1357 (Fed. Cir. 1998) ("In other words, the examiner must show reasons that the skilled artisan, confronted with the same problems as the inventor and with no knowledge of the claimed invention, would select the elements from the cited prior art references for combination in the manner claimed."). In addition, the reference relied upon by the Examiner as a basis for the rejection must be in the field of applicant's endeavor, or if the reference is not in the field of applicant's endeavor, then it should be reasonably pertinent to the problem to be solved. See, e.g., MPEP § 2141.01(a)(I).

Ueno, et al. teach a system for prioritizing the retrieval of e-mails, which have

accumulated in a single group mailbox, by a plurality of users or clients. See, e.g., Ueno, et al., abstract. Each e-mail is prepared or formatted into the format as shown in Figs. 15-16. Group e-mail messages arriving at the e-mail server are queued or stored in the group mailbox, and are retrieved based on the priority level (i.e., sender, elapsed time, question type, etc.) of the e-mail message and/or the parameters (i.e., GID, UID, PW, KW, etc.) passed to the server by the client. See, e.g., Ueno, et al., Figs. 11-13, col. 6, lines 23-29, col. 7, line 64 to col 8, lines 1-9. Ueno, et al. is completely silent with regards to edge servers, and to the location or proximity of the mailbox(es) with respect to the edge servers.

Ueno, et al. are only concerned with the problem of distributing e-mail messages that have arrived and accumulated at a particular mailbox (such as a group mailbox) to a plurality of clients that access the same mailbox, in a way that allows prioritization of the e-mail messages as they are being retrieved by the clients. Ueno, et al. do not appear to be connected in any way with, for example, grouping target addresses based on their **location**, and sending each group as well as the electronic content to be distributed to each address in the group to an **edge server closest to the addresses in the group** for further processing and/or distribution, which is one of the inventive features of Applicant's claimed invention. Accordingly, Ueno, et al. reference cannot be related to Applicant's field of endeavor and/or pertinent to the problem addressed by the Applicant. Reconsideration and withdrawal of Ueno, et al. reference is, therefore, respectfully requested.

Ueno, et al. and Kelly, et al. also cannot render the claimed invention obvious. A claim is obvious only if the applied references teach or suggest all the claim limitations. Contrary to the Examiner's assertion (see page 2, paragraph 3, lines 4-9, of the February 15, 2006 Office Action), Ueno, et al. fail to teach, for example, **sending electronic content and a group of addresses to an edge server that is in close proximity to the**

**addresses of the group**, and enabling the edge server to send or distribute the electronic content to each address or to a server on which the mailbox for the address resides. Ueno, et al. also fail to teach sending only one copy of the electronic content to the edge server that is associated with a group of addresses, and enabling the edge server to prepare a copy of the electronic content for each address in the group. This describes another inventive feature of Applicant's claimed invention, which minimizes the utilization of network resources (e.g., bandwidth) by having the edge server assemble and distribute copies of the electronic content for the addresses that are in close proximity to the edge server. As a result, not every single copy of the electronic content has to be sent out by the primary or central server to each of the target mailbox addresses, which could be widely dispersed throughout the network or Internet.

In addition, Kelly, et al. fail to teach or disclose adding localized information to an electronic content at the edge server to reduce bandwidth usage and processing load placed on the primary or central server.

For the reasons discussed above, the combination or modification of Ueno, et al. and Kelly, et al., as proposed by the Examiner, cannot render the claimed invention obvious because the references do not teach, disclose or suggest *every feature* of Applicant's invention, as recited in the claims. Reconsideration and withdrawal of the above ground of rejection is, therefore, respectfully requested.

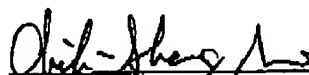
With regards to claims 2-4, 6-8, and 11-21, these claims recite subject matter similar to that recited in claims 1, 5 and 10, and were rejected for the same reasons used to reject claims 1, 5 and 10. For the remarks made in response to the rejection of claims 1, 5 and 10, which are also applicable and reasserted, as if in full, herein, in response to the rejection of claims 2-4, 6-8, and 11-21, it is believed that the reasons for rejecting these

claims have been overcome.

Accordingly, the application and claims are believed to be in condition for allowance, and favorable action is respectfully requested. No new matter has been added.

If any issues remain, the Examiner is respectfully invited to contact the undersigned at the number below to advance the application to allowance.

Respectfully submitted,

  
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